Appl. No. 10/004,131
Amdt. sent May 12, 2004
Reply to Office Action of November 6, 2003

PATENT

REMARKS/ARGUMENTS

Claims 6 - 16 are pending.

The instant application claims priority from Japanese Application No. 2001-226982, filed July 27, 2001. The specification has been amended to make the claim of priority. A certified copy of the priority document is being obtained and will be submitted in due course.

Claims 1 - 5 were rejected under 35 U.S.C. Section 102 for allegedly being anticipated by *Drapeau et al.*, paper entitled RAID-II: A HIGH-BANDWIDTH NETWORK FILE SERVER(I.E.E.E. publication, 1994). Claims 1 - 5 have been canceled without prejudice or disclaimer. Claims 6 - 16 have been appended.

The present invention is directed to a storage system. Aspects of the present invention as recited in independent claim 6, for example, includes "a single pool of disk drive units," a plurality of controllers," and "a connection unit connected between said single pool of disk drive units and said plurality of controllers, said connection unit configured such that any of said controllers can communicate with any of said disk drive unit." Each of the controllers comprises "a first circuit," "a second circuit," and "a data buffer for storing data that is transferred between said first circuit and said second circuit." Similarly, independent claim 16 recites "a single storage pool" and "a disk pool connection unit."

Drapeau et al. show in their Figure 2, an architecture in which an XBUS Disk Array Controller ("XBUS") is coupled to four Cougar disk controllers. Each Cougar disk controller is shown coupled to two SCSI strings, where each "string" comprises three disks. *Page 237, 2nd paragraph.*

In comparison, the present invention as recited in claim 6 includes "a single pool of disk drive units" and "a connection unit ... such that any of said controllers can communicate with any of said disk drive units." Each XBUS in *Drapeau et al.* can access only the strings of drives coupled to its associated Cougar disk controllers. Thus, *Drapeau et al.* do not show or suggest a single pool of disk drive units. Instead, they show disk controllers having one or two "strings" of drives, and therefore at best suggest multiple pools of disk drive units. *Drapeau et*

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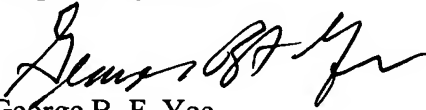Reply to Office Action of November 6, 2003

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al. do not show or suggest a connection unit. Instead, they show separate XBUS units, each having its strings of disk drives.

CONCLUSION

In view of the foregoing, all claims now pending in this Application are believed to be in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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